

EPA NEW ENGLAND MULTI-MEDIA CHECKLIST w/RCRA SURVEY

General Information

Inspector: US Army COE Date: 2/8/01RCRA RECORDS CENTER
FACILITY: US Army Corp of Engineers
I.D. NO. MAK060000107
FILE LOC. R-5
OTHER _____Facility Name: Ginny Lombardo Contact: _____Address: _____
(STREET) (CITY) (STATE) (ZIP)

Phone No.: () - SIC Code: No. Employees: _____

Products mfg. and description of facility: _____

Headquarters RCRA Compliance Informational Survey

1. Did you provide Compliance Assistance?

☐ Yes ☒ No

If yes, which of the following did you provide? (Check all that apply)

- ☒ Answered questions about requirements, best management practices, etc.
☐ Promised to provide materials (e.g., guides, manuals, Net URLs, policies)
☐ Identified an EPA or other contact for further information
☐ Alerted facility to future regulatory requirements
☐ Notified facility of upcoming seminars
☐ Other _____

2. Were any deficiencies identified to the facility at the time of the inspection? ☒ Yes ☐ No

If yes, what type of deficiencies were noted? (Check all that apply)

- ☐ Hazardous waste identification/determinations
☐ No generator ID number
☒ Reporting or record keeping
☐ Inadequate manifests for waste shipments
☒ Training/Training Plan Deficiencies
☒ Contingency Plan Deficiencies
☐ Failure to meet compliance schedule
☐ Illegal storage, treatment, or disposal of hazardous waste
☐ Other Labeling, Posting

3. Did facility take corrective action for the deficiencies identified above? ☒ Yes ☐ No

If yes, what corrective action was taken? (Check all that apply)

- ☒ Placed labels on hazardous waste containers
- ☐ Covered open containers
- ☐ File necessary reports
- ☐ Completed hazardous waste manifests on-site
- ☐ Identified hazardous waste and actively moved to required storage area
- ☐ Other HW Posting, Delineation of Storage Area

4. Did facility commit to correct any deficiencies after the inspection? ☐ Yes ☐ No

If yes, what corrective action will be taken?

- ☐ Place labels on hazardous waste containers
- ☐ File necessary reports
- ☐ Locate hazardous waste manifests
- ☐ Locate LDR Notices
- ☐ Locate Annual/Biennial Hazardous Waste Reports
- ☐ Conduct Hazardous Waste Testing/Determinations
- ☐ Develop Personnel Training Plan
- ☐ Conduct Personnel Training
- ☐ Develop/Update Contingency Plan
- ☐ Other _____

5. Are you aware of any environmentally beneficial actions, other than those identified in Questions 3 and 4, that the facility has taken or will take in response to the inspection? ☐ Yes ☐ No

If yes, what actions were made known to you? (Check all that apply)

- ☐ Change in production process
- ☐ Institute pollution prevention or waste minimization program project
- ☐ Change treatment facility operations
- ☐ Institute best management practices
- ☐ Other _____

End of Headquarters Survey

Air: Stationary Source Compliance

- 1.O Did you observe opaque smoke emitted from a smokestack (dark enough to obscure anything behind the plume)? NO If yes - Which process line (be specific, i.e., boiler No. 4)? _____ - Air pollution control equipment out of service? ____ - If yes - When will it be back on line? _____
- 2.OP Did you smell any strong odors? NO If yes, from what process? _____ What chemicals (i.e., solvents) were causing the odors? _____ Is the process controlled by air pollution control equipment? _____
- 3.I Has the facility added any processes which emit air pollutants or expanded any pre-existing air-pollution emitting processes in the last two years? NO - If yes, what type of process was added? _____ Did the facility obtain a state air permit? _____
- 4.I Does the facility operate a Degreaser(s) that uses one of the following cleaning solvents: NO
Methylenechloride Perchloroethylene Trichloroethylene
111-Trichloroethane Carbontetrachloride Chloroform
If yes has the facility submitted an initial notification and a notification of compliance to the EPA? _____

EPCRA N313 (Spill Notification/Chemical Inventory) and CAA 112r Risk Management Plans

- 1.I Has the facility experienced any accidental releases above the Reportable Quantity (RQ) within the last three years? NO If yes, provide the name of the chemical released, the quantity and the date. _____
- 2.I Does the facility have on-site at any time during the calendar year a) 10,000 lbs or more of any hazardous chemical requiring an MSDS or b) a threshold reporting quantity of a listed Extremely Hazardous Substances (EHS). NO
- 3.I If yes, have Tier II chemical inventory forms been filed annually with the fire department and local / state planning authorities? NA
- 4.I Does the facility have more than a threshold quantity of a listed chemical in any individual process (including storage) requiring preparation of a Risk Management Plan?
- 5.1 If yes, has the facility submitted an RMP summary to EPA via the Internet?

EPCRA Section 313 (Toxic Release Inventory)

- 1.I Does the facility manufacture, process, or use any toxic chemicals in a quantity greater than 10,000 lbs per year? NO
- 2.I Has the facility submitted any toxic chemical release forms (Form R) to EPA? _____

FIFRA

- 1.I Does the facility manufacture, distribute, repack, relabel, store or use pesticides? (Product which would be considered pesticides include disinfectants, sterilizers, germicides, algicides, virucides, swimming pool compounds, insecticides, fungicides, herbicides, etc.) NO
- 2.I If yes, does the label bear an EPA registration and establishment number? _____

RCRA

- 1.I Does the facility generate or otherwise handle hazardous waste? If so, describe the types of hazardous waste generated/handled, and state whether it is generated on-site or received from off-site. _____
- 2.OP Do you see any waste stored in containers, drums, tanks, pails, or dumpsters? Note the approximate quantity of waste, and its location. _____
- 3.OP Are there any containers or tanks of hazardous waste that are open or in poor condition (leaking, corroded, etc.)? If so, describe waste (e.g., liquid, sludge, etc.), indicate markings on containers/tanks and the container/tank location(s). _____
- 4.OP Is there any evidence of spills or leaks or dumping to the ground, pits or lagoons? If so, note location and extent of release. _____
- 5.I Does the facility operate a boiler or industrial furnace? Has there been any incineration of hazardous waste on-site? If so, what type of hazardous waste, and is this an ongoing operation? _____

SPCC

- 1.I How many gallons of oil does the facility store above and below ground? Small
Quantities in generators + vehicles
 - If the facility stores more than 660 gallons in a single tank or more than 1320 gallons in a number of tanks above ground or more than 42,000 gallons below ground - Does the facility have a certified SPCC (Spill Prevention, Control, and Countermeasure) plan signed by a P.E.? _____ Date of plan: _____ Certifying P.E. No. _____

TSCA PCB

- 1.OI Is there any evidence of liquid-filled electrical equipment that may contain PCBs? No

If "yes", describe type of equipment: _____

- 2.IP If the above equipment is considered to contain PCBs, what was the basis for this determination:

based on- marking with "Large PCB Mark"? Yes:___ No:___

based on- equipment Nameplate? Yes:___ No:___

based on- information from facility rep.? Yes:___ No:___

- 3.OP Is there any evidence of spills or leaks from transformers, capacitors, or other liquid-filled electrical equipment that may contain PCBs? Yes:___ No:___

If "yes", describe type of equipment and spill or leak _____

- 4.OP Are there any PCB items (equipment, drums of waste or other containers) in storage for disposal? Yes: ✓ No:___

Where are these items being stored and what is their condition? Corn cob
has PCB oils + RCRA metals

TSCA Core

- 1.I Does the facility manufacture (synthesize anew) any chemical substances in any amount? No If so, in simple terms, what chemical(s) do they make? _____

- 2.I Does the facility import any chemical substances into the United States? (Company is

"Importer of Record") _____

UST

- 1.I Does the facility store in USTs motor fuels, waste oils, and/or hazardous substances?
 __ YES __ NO (Note: USTs containing heating fuels for on-site heating purposes are exempted from RCRA UST.)

If Yes, ask:

- 2.I Are the USTs registered with the state? __ YES __ NO (Each state keeps notification data for USTs)
- 3.I Is some form of leak detection in use for the UST system's tank and associated piping)?
 __ YES __ NO
- 4.I Are records available showing registration and monthly leak detection along with the yearly UST system tightness test? __ YES __ NO

Water

A. DIRECT (NPDES) & INDIRECT (PRETREATMENT) DISCHARGERS

1. I Has the facility expanded its production, wastewater flow or changed its processes since its last permit? NO
- O Did you observe any outfalls? ____ If so, was there any discoloration, steam, oil sheen, or odor? _____
2. P Does the facility use water in its manufacturing processes? _____
 If yes ---
- I a Does the facility discharge wastewater (process, sanitary, cooling, etc.) into a surface water, municipal sewer system, or a subsurface system? _____ Is the municipal sewer separate or combined? _____
- I b Are all of the discharges covered by a permit? _____
3. P Does the facility have floor drains? NO If yes ---
 a) Are materials stored in a manner that leaks or spills could enter the floor drains? _____
 b) Are materials dumped down the floor drains? _____
- I c) Where do the floor drains discharge (1. treatment facility, 2. municipal sewer, 3. subsurface system, 4. storm drain or 5. surface water)? _____
4. Does the facility treat its process and/or sanitary wastewater prior to discharge? NO

If yes ---

- OP a) Is the treatment equipment operational, clean, and well maintained? _____
- OP b) Is the discharge free of solids, color and odor? _____

B. STORM WATER

1. O Are there catch basins, drains, culverts, ditches, etc. on the property intended to convey storm water. _____ If yes --- Is the storm water conveyed to a (1) treatment facility, (2) combined sewer, (3) separate storm sewer, (4) separate sanitary sewer, or (5) surface water? _____

2. I Are the storm water discharges covered by a permit or has the discharger applied for a permit? _____

3. O Are materials stored outside? _____ If yes ---
- a) Are materials (1) stored in sealed containers, under tarps or roofs, or (2) are they open to contact with precipitation? _____
- b) Are outside material handling/storage areas clean and kept in a manner to prevent contamination of runoff? _____

Wetlands

1. O Within view, are there a) streams, ponds or other water bodies; b) vegetated areas with standing water; or c) areas with mucky, peaty or saturated (squishy) soils? If yes, have any of these areas been disturbed by waste/refuse disposal, storage of materials, ditching, or filling? If yes, briefly describe: _____
2. I If yes to both "Observable" questions, does facility have a federal CWA section 404 permit, or any state or local permit authorizing the activity (ies) observed? _____

Underground Injection Control (UIC)

Subsurface Wastewater Disposal

- 1.A. [I] Does the facility discharge fluid wastes to drains, plumbing, or drainage systems connected to a subsurface wastewater disposal system(s) listed below? Yes: ___ No: ___
- If "yes", Circle discharged fluid waste type(s) in list below.
- If "yes", Circle subsurface wastewater disposal system type(s) in list below.

- 1.B. [I] Does the facility have a state or local permit authorizing the subsurface wastewater disposal system(s)? Yes: ___ No: ___

Refer to UIC Coordinator if: 1.A. is Yes and 1.B. is No.

Subsurface Sewage Disposal

- 2.A. [I] Does the facility have an onsite sewage disposal system(s) that serves more than 20 people per day? Yes: ___ No: ___

- 2.B. [I] Does the facility have a state or local permit authorizing the onsite sewage disposal system(s)?

Yes:___ No___

2.C. [I] Is the onsite sewage disposal system used to dispose of any fluid waste type(s) listed below?

Yes:___ No___

If "yes", Circle discharged fluid waste type(s) in list below.

Refer to UIC Coordinator if: 2.A. is Yes and 2.B. is No.

Refer to UIC Coordinator if: 2.C. is Yes

3. [O] Do you observe any floor drain(s) or surface drain(s) that can receive any of the fluid waste type(s) listed below? Yes:___ No___

If "yes", Check the discharged fluid waste type(s) in list below.

3. [I] If "yes", Where does the facility drain(s) discharge: a. Municipal Sewer? _____

b. Subsurface disposal system type(s) listed below? _____ c. Unknown _____

Refer to UIC Coordinator if: 3.[O] is Yes and 3.[I] is b. or c.

Disposal System Type

dry well	septic system	cesspool	leach field	leach pit	leaching trench	disposal well
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Fluid Waste Type

Liquid Wastes Process Wastewater Non-Contact Cooling Water Boiler Blowdown Fluids Air Conditioning Fluids Heat Pump Fluids Other Waste _____	Wash Water, Spills or Storm Water from: * maintenance areas * hazardous material or waste storage areas * hazardous material or waste handling areas * process or manufacturing areas * fuel storage areas * areas prone to hazardous substance release
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Pollution Prevention (Optional)

1.I Does your facility have a pollution prevention, toxics use reduction, or RCRA waste minimization program?

Would you be interested in finding out more about pollution prevention techniques?

Take a look at this brochure, and feel free to call any of the EPA, state or other staff listed for more information.

CODES

O - OBSERVABLE P - PROCESS I - INTERVIEW

ADDITIONAL COMMENTS

CONCLUSION

RECOMMENDATION FOR FOLLOW-UP

Forwarded to Contact	Phone	Mail Code
Al-Subany	918-1823	SEA
ECRA 313	918-1743	SEA
TSCA Core	918-1861	SEA
ECRA (Non-13)	918-1749	SEA
PFRA	918-1823	SEA
RCRA	918-1751	SEA

ADDITIONAL COMMENTSCONCLUSIONRECOMMENDATION FOR FOLLOW-UP

Forwarded to Contact		Phone	Mail Code
Air-stationary	Fred Weeks	918-1855	SEA
EPCRA 313	Cynthia L. Brown	918-1743	SEA
TSCA Core	Rose Toscano	918-1861	SEA
EPCRA (Non313)	Don Mackie	918-1749	SEA
FIFRA	Wayne Toland	918-1852	SEA
RCRA	Ken Rota	918-1751	SER
SPCC	Don Grant	918-1768	SEW
TSCA PCB	Abdi Mohamoud	918-1858	SEA
UST	Bill Torrey	918-1311	HBO
WATER	Joan Serra	918-1881	SEW
UIC	Dave Delaney	918-1614	CMU
WETLANDS	Kyla Bennett	918-1727	SEE
RMP	Ray DiNardo	918-1804	SPP

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ADDENDUM ON WHEN TO REFER

AIR - Stationary Sources

Question 1: Refer the checklist any time you observe opaque smoke from the facility's stack. Excess opacity may be a sign of operational problems or that the facility is not operating according to design specifications and/or air pollution permit requirements.

Question 2: Refer the checklist anytime you sense odors from a process. The facility may be having trouble with its air pollution capture and/or destruction equipment or may not be following good engineering work practices.

Question 3: Refer the checklist if a facility has not obtained a state air permit for a new process or piece of air pollution control equipment (EPA no longer writes air permits). Not all installations require a permit. Therefore, the air program will follow-up to determine if the new device required a permit.

Question 4: Refer the checklist if the facility answers yes.

EPCRA (Chem. Inventory)

Refer if:

YES to question 1

YES to question 2 — (question 3 must be completed)

EPCRA Section 313 (Toxic Release Inventory)

If answer to 1. is yes, please refer.

FIFRA

If Question 2 is No; refer.

RCRA

Refer if:

(O) Answers to questions 3 or 4 are YES.

(P) Answer to questions 3 or 4 are YES.

(I) Answer to question 1 is that hazardous waste are received from off-site. (Acceptance of hazardous waste from off-site may indicate that a facility is an illegal TSDF.)

Answer to question 5 indicates that hazardous waste is burned on-site. (If waste oils alone are burned on-site, do not refer the checklist to RCRA.)

SPCC

If no SPCC plan where needed, please refer.

TSCA PCB

If the answers to questions 2 or 3 are "yes," please refer to the TSCA PCB Program.

TSCA CORE

If the answer to 1 or 2 is yes refer to TSCA.

UST

If the answer to Question 1 is yes and the answer(s) to any of questions 2,3, or 4 is/are no, please notify the OUST or send the office a copy of the checklist.

WATER

If the answer to

- A.1 is YES, refer to Water
- A.2.b. is NO, refer to Water
- A.3.c. is either 2, 3, or 4, refer to Water
- A.4 is NO, refer to Water
- B.1.a is either 3 or 4, refer to Water
- B.2 is NO, refer to Water
- B.3.a.2 is Yes, refer to Water
- B.3.b is NO, refer to Water

WETLANDS

If "yes" to both Observable questions and "no" to Interview question (or facility cannot produce federal CWA section 404 permit), refer checklist to EPA Wetlands Program contact.

ACRONYMS

AIR

AFS: AIRS Facility Subsystem (EPA's air compliance database)
AIRS: Aerometric Information Retrieval System
BACT: Best Available Control Technology
CAA: Clean Air Act
CAAA: Clean Air Act Amendments
CEM/CEMS: Continuous Emission Monitoring/System
CFC: Chlorofluorocarbon
EER: Excess Emission Report
HAP: Hazardous Air Pollutant
HON: Hazardous Organic NESHAP
LAER: Lowest Achievable Emission Rate
NAAQS: National Ambient Air Quality Standards
NARS: National Asbestos-Contractor Registry System
NESHAPS: National Emission Standards for Hazardous Air Pollutants
NSPS: New Source Performance Standards
NSR: New Source (Pre-construction) Review
PM: Particulate Matter
RACT: Reasonably Available Control Technology
SIP: State Implementation Plan
VE: Visible Emissions
VOC: Volatile Organic Compounds

EPCRA

EPCRA: Emergency Planning and Community Right-to-Know Act
LEPC: Local Emergency Planning Committee
SERC: State Emergency Response Commission
TRI: Toxic Release Inventory

FIFRA

FIFRA - Federal Insecticide, Fungicide, and Rodenticide Act,
 as Amended
EPA Reg. No. - EPA Registration Number (one for each pesticide)
EPA Est. No. - EPA Establishment Number (where a pesticide is
 manufactured)

RCRA

RCRA - Resource Conservation & Recovery Act
HSWA - Hazardous and Solid Waste Amendments

TCLP - Toxicity Characteristic Leaching Procedure
 LDR or Land Ban - The Land Disposal Restrictions
 TSDF - Treatment, Storage and Disposal Facility
 LQG - Large Quantity Generator
 SQG - Small Quantity Generator
 BIF - Boiler and Industrial Furnace

TSCA/PCBs

TSCA - Toxic Substances Control Act
 PCBs - Polychlorinated biphenyls
 ML - Large PCB Mark

UST

UST - Underground Storage Tanks
 OUST - Office of UST

UIC

	Fluid Type	UIC Well Type
* liquid wastes	* stormwater, washwater and/or spill drainage from	* well
* process wastewater	- maintenance areas	* leach field
* non process wastewater	- hazardous material	* leaching pit
* non contact cooling water	or hazardous waste storage, staging or handling areas	* leaching trench
* heat pump or air conditioning fluids	- process or manufacturing areas	* dry well
* untreated sewage effluent	- fuel storage areas	* cesspool
* treated sewage effluent from a treatment plant or septic system	- other areas susceptible to hazardous substance release	* other

WETLAND

CWA - Clean Water Act

404 - specific section of the CWA regulating the discharge of dredged or fill material into waters of the U.S., including wetlands.